

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDRE FELIX, individually and on  
behalf of all others similarly situated,

Plaintiff,

Case No.: 2:25-CV-01695-JMY

v.

CONNECTAMERICA.COM, LLC,

Defendant.

**THIRD CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF’S COMPLAINT**

AND NOW, comes the Defendant, CONNECTAMERICA.COM, LLC (hereinafter “CA”), by and through its counsel, MARSHALL DENNEHEY, P.C. and DANIELLE M. VUGRINOVICH, ESQUIRE and files the within Third Consent Motion for Extension of Time to File Response to Complaint, averring as follows:

1. Plaintiff’s Complaint alleges a putative class action pursuant to the Telephone Consumer Protection Act, 47 U.S.C §227.
2. The Complaint was filed on April 1, 2025. *See, ECF No. 1.*
3. The summons was issued on April 2, 2025. *See, ECF No. 3.*
4. Undersigned counsel and her firm were retained on May 1, 2025.
5. Undersigned counsel and her firm entered her/its on May 2, 2025. *See, ECF No. 4.*
6. Defendant requested an additional twenty-one (21) days to respond to the Complaint, to which Plaintiff consented.
7. On May 5, 2025, an Order as entered granting Defendant’s request and ordering Defendant’s response to be due on May 23, 2025.

8. During Defendant's investigation into Plaintiff's claims, Defendant believed that it had discovered information indicating that the wrong entity was named as the Defendant and that an affiliate of Defendant would be the appropriate party.

9. Undersigned counsel advised Plaintiff's counsel of this development, requested that we meet and confer to attempt to resolve the issue and requested additional time to respond to the Complaint while the parties attempt to resolve such issues. Defendant also advised of other issues that it intended to raise in a Rule 12 Motion. Plaintiff's counsel consented to the requested extension.

10. Defendant filed a Motion for Extension of Time to Respond to Complaint, which was granted. Defendants' response to the Complaint is due on June 13, 2025.

11. Defense counsel worked diligently to investigate whether the proper entity was named, which took time. It was ultimately determined and confirmed on June 11, 2025 that, indeed, the property entity had been named. Defendant no longer intends to file a Rule 12 Motion.

12. Defendant will file an Answer and Affirmative Defenses.

13. As Defendant was only able to confirm that the proper entity was named 2 days prior to the response deadline and had intended to proceed with filing a Motion to Dismiss, Defendant respectfully requests an additional ten (10) days to file its Answer and Affirmative Defenses.

14. Plaintiff's counsel graciously consents to this Request

15. The Rule 16 Conference is currently scheduled to occur on June 24, 2025.

16. Defendant's Answer and Affirmative Defenses will be filed prior to the Rule 16 Conference.

17. No party will be prejudiced by Defendant's request for an extension of time of ten (10) days.

WHEREFORE, Defendant, CONNECTAMERICA.COM, LLC respectfully requests that this Honorable Court grant its Third Consent Motion for Extension of Time to Respond to Plaintiff's Complaint and enter the attached proposed Order of Court.

Respectfully submitted,

**MARSHALL DENNEHEY, P.C.**

BY:



Danielle M. Vugrinovich  
PA ID #88326

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